IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA **CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

Master File No. 2:12-MD-02327 MDL 2327

LITIGATION

ETHICON WAVE 2 CASES LISTED IN PLAINTIFFS' EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT **JUDGE**

NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE REGARDING BRIAN N. SCHWARTZ, M.D. FOR WAVE 2

Defendants Ethicon, Inc. and Johnson & Johnson (Ethicon) hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general-causation opinions of Brian N. Schwartz, M.D. for Ethicon Wave 1, Dkt. 2141. Ethicon respectfully requests that the Court deny Plaintiffs' motion, for the reasons expressed in the Wave 1 response briefing.

Dated: August 5, 2016 Respectfully submitted,

> ETHICON, INC. AND JOHNSON & JOHNSON

/s/ Rita A. Maimbourg

Rita A. Maimbourg TUCKER ELLIS LLP 950 Main Avenue, Suite 1100 Cleveland, OH 44113-7213

Tel: 216.592.5000 Fax: 216.592.5002

rita.maimbourg@tuckerellis.com

/s/ David B. Thomas

David B. Thomas (W.Va. Bar #3731) THOMAS COMBS & SPANN PLLC 300 Summers St. Suite 1380 (25301) P.O. Box 3824 Charleston, WV 25338 Tel: 304.414.1807 dthomas@tcspllc.com

/s/ Christy D. Jones

Christy D. Jones BUTLER SNOW LLP 1020 Highland Colony Parkway Suite 1400 (39157) P.O. Box 6010 Ridgeland, MS 39158-6010 Tel: 601.985.4523

christy.jones@butlersnow.com

CERTIFICATE OF SERVICE

I certify that on August 5, 2016, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ Rita A. Maimbourg

Rita A. Maimbourg TUCKER ELLIS LLP 950 Main Avenue, Suite 1100 Cleveland, OH 44113-7213

Tel: 216.592.5000 Fax: 216.592.5002

rita.maimbourg@tuckerellis.com